

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION**

LUPIN ATLANTIS HOLDINGS SA, a
foreign corporation, and LUPIN INC., a
Delaware Corporation,

Plaintiffs,

v.

Case No.: 0:23-cv-61621-MD

XIAN-MING ZENG, TRANSPIRE BIO,
INC., AXEL PERLWITZ, and WILLIAM
SCHACHTNER,

Defendants.

**DEFENDANTS' UNOPPOSED REQUEST FOR HEARING ON MOTIONS FOR
SUMMARY JUDGMENT AND *DAUBERT* MOTION**

Defendants Xian-Ming Zeng, Transpire Bio, Inc., Axel Perlwitz, and William Schachtner (“Defendants”) hereby request a three-hour hearing on the parties’ summary judgment and *Daubert* motions, D.E. 197, 201, 202, 205 (the “Motions”), which address eight claims against four separate defendants. Briefing on the Motions will be completed on April 14, 2025.

Defendants respectfully submit that oral argument will promote judicial economy by assisting the Court in evaluating both the facts and legal authorities addressed in the Motions. On September 16, 2024, this Court conducted a three-hour oral argument on Defendants’ Motion to Dismiss, D.E. 39; Defendants believe that the motions for summary judgment will warrant at least as much time for discussion.

Defendants have conferred with Plaintiffs who do not oppose this Request for Hearing.

Dated: March 28, 2025

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**

/s/ Samuel G. Williamson

Samuel G. Williamson
Florida Bar No. 1033817
samuelwilliamson@quinnemanuel.com
Shalia M. Sakona
Florida Bar No. 107398
shaliasakona@quinnemanuel.com
Olivia A. Barket Yeffet
Florida Bar No. 1026382
oliviayeffet@quinnemanuel.com
David M. Walsh
Florida Bar No. 1048823
davidwalsh@quinnemanuel.com
2601 South Bayshore Drive, Suite 1550
Miami, Florida 33133
(305) 402-4880

Jared Newton (admitted *pro hac vice*)
jarednewton@quinnemanuel.com
1300 I Street NW, Suite 900
Washington, DC 20005

Nima Hefazi (admitted *pro hac vice*)
nimahefazi@quinnemanuel.com
865 South Figueroa Street, 10th Floor
Los Angeles, California 90017
(213) 443-3000

Andrew G. Shifren (admitted *pro hac vice*)
andrewshifren@quinnemanuel.com
295 5th Avenue, 9th Floor
New York, New York 10016
(212) 849-7181

Jocelyn Ma (pending *pro hac vice*)
jocelynma@quinnemanuel.com
50 California Street, 22nd Floor
San Francisco, California 94111
(415) 875-6600

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document is being filed on March 28, 2025, and served on all counsel of record on the Service List attached via transmission of Notice of Electronic Filing generated by CM/ECF.

/s/ Samuel G. Williamson

Samuel G. Williamson

Florida Bar No. 1033817

samuelwilliamson@quinnemanuel.com